

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

LETISHEA WAGGONER

Plaintiff,

v.

BELLSOUTH TELECOMMUNICATIONS,
INC.,

Defendants.

CASE NO. 3:09-0198

Judge: William J. Haynes, Jr.

DEFENDANT'S MOTION TO COMPEL
PLAINTIFF TO RESPOND TO DEFENDANT'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS
TO PLAINTIFF AND FOR SANCTIONS

Despite multiple requests, Plaintiff has steadfastly refused to provide any response at all to Defendant's First Request for Production and Things to Plaintiff. She has also failed to reply to Defendant's Request for Admission. Consequently, Defendant BellSouth Telecommunications, Inc. ("Defendant") must now file this Motion to Compel Plaintiff to Respond to the Requests for Production and to seek sanctions.

I. STATEMENT OF FACTS

In an attempt to discern the factual bases for Plaintiff's claims, on December 30, 2009, Defendant served written discovery, via United States mail, on Plaintiff. (Copies of those discovery requests are attached at Exhibit A.) At the same time, Defendant served Requests for Admission.

Giving Plaintiff the benefit of the doubt, Defendant gave Plaintiff ample time to respond, yet received nothing. Thus, on February 11, 2010, counsel for Defendant contacted Plaintiff via letter (copy of letter attached as Exhibit B) requesting that the responses be provided no later

Depen
The motion to
compel is Ed AR R/A
Plaintiff has 30
days to submit
her responses to
these discovery
requests or
risk
dismissal
of this
action.
The motion
for sanctions
is D.E. 1107
without prejudice
to renew.
Will [signature]
2/8/10
1/2/10